

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

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**DARK CIRCUIT LABS, INC.,**

Plaintiff,

vs.

**BLACK SAILS SECURITY, LLC, *et al.*,**

Defendants.

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Case No.: 1:23-cv-326 (LMB/LRV)

**ERIC MISSIMER,**

Plaintiff,

vs.

**DARK CIRCUIT LABS, INC.,**

Defendant.

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Case No.: 1:23-cv-476 (LMB/LRV)

**PLAINTIFF DARK CIRCUIT LABS, INC.’S NOTICE OF MOTION FOR LEAVE TO  
AMEND PLAINTIFF’S FIRST AMENDED VERIFIED COMPLAINT  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 15.**

Plaintiff Dark Circuit Labs, Inc. (“Plaintiff”), by and through its attorneys, Peckar & Abramson, P.C., respectfully moves to amend its First Amended Verified Complaint pursuant to Federal Rule of Civil Procedure 15. The grounds for this Motion are set forth in Plaintiff’s Memorandum of Law, dated June 16, 2023, the Declaration of Counsel, and accompanying exhibits.

Dated: June 16, 2023

Respectfully submitted,

**PECKAR & ABRAMSON, P.C.**

*Attorneys for Plaintiff, Dark Circuit Labs, Inc.*

By: */s/ Steven J. Weber*

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STEVEN J. WEBER, VSB No. 35573

*/s/ Lucas T. Daniels*

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LUCAS T. DANIELS, VSB No. 91557

*/s/ Gregory R. Begg*

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GREGORY R. BEGG\*

*/s/ Lauren Rayner Davis*

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LAUREN RAYNER DAVIS\*

*\*Admitted Pro Hac Vice*

**CERTIFICATION OF SERVICE**

I hereby certify that, on the 16<sup>th</sup> day of June 2023, I caused a true and accurate copy of the foregoing Motion for Leave to File Second Amended Complaint to be served on counsel of record via the CM/ECF system.

*/s/ Steven J. Weber*

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Steven J. Weber